UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, et al., Plaintiffs, v. GOOGLE LLC, Defendant.	Case No. 20-cv-04688-RS (AGT) **DISCOVERY ORDER** Re: Dkt. Nos. 211, 213

On January 20, 2022, the Court instructed Google to run a number of additional ESI searches. *See* Dkt. 208. The Court also asked for supplemental briefing on several other proposed searches. *See id.* at 4 nn. 5–6. The parties submitted that supplemental briefing, and having considered it the Court now orders Google to run the additional searches indicated below with an "X" in the column labeled "Google to Search." For searches not marked with an "X," the plaintiffs may propose new, narrower terms, but the terms proposed are overbroad. If the plaintiffs propose new terms, they must provide those terms to Google and the parties must meet and confer to discuss them before returning to the Court.

No.	Search Terms	Google to Search:
Custodian: Francis Ma[1]		
40b-1	(FCM or "cloud messaging") AND (Gold OR analytics OR GA4F OR scion OR ((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* or sWAA OR "my account" or "my activity" OR conversion* OR AdMob OR "Google mobile service" OR GMS OR Clearcut OR "Google Mobile Platform" OR GMP)	X
40b-2	(FCM or "cloud messaging") /15 firebase	

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[1] Each search term under an identified custodian's name should be employed for that custodian.

United States District Court
Northern District of California

No.	Search Terms	Google to Search:
40b-3	(FCM or "cloud messaging") /15 perform*	X
40b-4	(FCM or "cloud messaging") /15 event	X
40b-5	(FCM or "cloud messaging") /15 audience	X
Custodian: Todd Hansen		
40c-1	(FCM or "cloud messaging") /10 (Gold OR analytics OR GA4F OR scion OR ((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR "my account" or "my activity" OR conversion* OR AdMob OR "Google mobile service" OR GMS OR Clearcut OR "Google Mobile Platform" OR GMP)	X
40c-2	(FCM or "cloud messaging") /5 firebase	
40c-3	(FCM or "cloud messaging") /10 perform*	X
40c-4	(FCM or "cloud messaging") /10 event	X
40c-5	(FCM or "cloud messaging") /10 audience	X
Custodian: Steve Ganem		
43b-1	(Analytics OR GA4F OR Scion OR "Google Mobile Platform" OR GMP) AND (((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* OR sWAA OR "my account" OR "my activity" OR AdMob OR FCM OR "Cloud Messaging" OR appmeasurement)	X
43b-2	Firebase /15 (((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* or sWAA OR "my account" OR "my activity" OR perform* OR conversion* OR event OR audience OR AdMob OR FCM OR "Cloud Messaging" OR appmeasurement OR "Google mobile service" OR GMS OR Clearcut)	
43b-2[2] (modified)	Firebase /15 (((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* or sWAA OR "my account" OR "my activity" OR perform* OR conversion* OR event OR audience OR AdMob OR appmeasurement OR "Google mobile service" OR GMS OR Clearcut)	X
43b-3	(Analytics OR GA4F OR Scion OR "Google Mobile Platform" OR GMP) /5 conversion*	

[2] To avoid the redundancy of combining Firebase with FCM or Cloud Messaging, *see* dkt. 213 at 2, the Court has removed FCM and Cloud Messaging from 43b-2. A search that combines FCM or Cloud Messaging with Analytics, GA4F, Scion, Google Mobile Platform, or GMP isn't redundant and will be allowed via search 43b-1.

No.	Search Terms	Google to Search:
43b-4	(Analytics OR GA4F OR Scion OR "Google Mobile Platform" OR GMP) /15 conversion*	X
43b-5	(Analytics OR GA4F OR Scion OR "Google Mobile Platform" OR GMP) /15 perform*	X
43b-6	(Analytics OR GA4F OR Scion OR "Google Mobile Platform" OR GMP) /15 event	X
43b-7	(Analytics OR GA4F OR Scion OR "Google Mobile Platform" OR GMP) /15 audience	X
43b-8	(Analytics OR GA4F OR Scion OR "Google Mobile Platform" OR GMP) /15 ("Google mobile service" OR GMS OR Clearcut)	X
43b-9	Gold /15 (((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* or sWAA OR "my account" or "my activity" OR AdMob OR FCM OR "Cloud Messaging" OR appmeasurement)	X
43b-10	Gold /5 conversion	X
43b-11	Gold /15 (perform* OR event OR audience OR "Google Mobile Service" OR GMS OR Clearcut)	X
Custodian: Monsees, Ma, Hansen, Weng		
43c-1	("Google Mobile Service" OR GMS OR Clearcut) /10 (Gold OR analytics OR GA4F OR scion OR "Google Mobile Platform" OR GMP OR ((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* or sWAA OR "my account" OR "my activity" OR conversion* OR FCM OR "cloud messaging" OR AdMob)	X
43c-2	("Google Mobile Service" OR GMS OR Clearcut) /10 firebase	X
43c-3	("Google Mobile Service" OR GMS OR Clearcut) /10 perform*	X
43c-4	("Google Mobile Service" OR GMS OR Clearcut) /10 event	X
43c-5	("Google Mobile Service" OR GMS OR Clearcut) /10 audience	X

IT IS SO ORDERED.

Dated: February 10, 2022

ALEX G. TSE
United States Magistrate Judge